

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No: 3:17-CR-00155-L (2)
	§	
JAMSHID NORIYAN, et al.	§	

**DAVID NOURIAN’S OBJECTIONS TO
THE GOVERNMENT’S EXHIBIT LIST**

Pursuant to the Court’s Amended Criminal Trial Scheduling Order (Dkt. 540), Defendant David Nourian files the following objections to the Government’s Exhibit List (Dkt. 564). Defendant Nourian reserves the right to adopt the objections of other parties. Defendant Nourian further reserves the right to amend or add to these objections based on testimony adduced at trial.

GX	DESCRIPTION	OBJECTION	NOTES
100s – Secretary of State Records			
101	Ability Secretary of State Filings		
102	Industrial and Family Secretary of State Filings		
103	Park Row Pharmacy Secretary of State Filings		
104	Bandoola Secretary of State Filings		
105	HJLM Holding LLC Secretary of State Filings		
106	Queen Shiva LLC Secretary of State Filings		
107	Ace Queen LLC Secretary of State Filings		
108	Ace King LLC Secretary of State Filings		
109	Michael Taba M.D. Secretary of State Filings		

GX	DESCRIPTION	OBJECTION	NOTES
110	Magnum Surgical Products LLC Secretary of State Filings		
111	Jade and Joy LLC Secretary of State Filings		
112	Benson Injury Clinic P.A. Secretary of State Filings		
200s – Claims Data & Insurance Documents			
201	DOL Provider Enrollment Contract for Ability Pharmacy, Inc.		
202	CVS Caremark Provider Enrollment Contract for Ability Pharmacy, Inc.		
204	BCBS Employer Enrollment Apps for Ability Pharmacy		
205	DOL Provider Enrollment Contract for Industrial and Family Pharmacy, LLC		
206	CVS Caremark Provider Enrollment Contract for Industrial and Family, Inc.		
207	DOL Provider Enrollment Contract for Park Row Pharmacy, LLC		
208	CVS Caremark Provider Enrollment Contract for Park Row Pharmacy, LLC		
209	DOL Provider Enrollment Contract and EFT for Michael Taba, M.D.		
210	DOL Provider Enrollment Contract for Kevin Williams, MD		
211	DOL Provider Enrollment Contract for Leslie Benson, M.D.		
212	DOL Billing Data for Ability Pharmacy, Inc - DOL CERTIFIED		
213	BCBS Billing Data for Ability Pharmacy Inc. and Industrial & Family Pharmacy, LLC		
214	DOL Billing Data for Industrial & Family Pharmacy, LLC - DOL CERTIFIED		
215	DOL Billing Data for Park Row Pharmacy, LLC - DOL CERTIFIED		
216	BCBS Billing Data for Park Row Pharmacy, LLC		
217	DOL Ability, IFP, and Park Row Third Party Billers		

GX	DESCRIPTION	OBJECTION	NOTES
218	Prime Therapeutics - ABILITY PHARMACY INC		
219	Prime Therapeutics - PARK ROW PHARMACY		
220	CVS Caremark Provider Manual - 2014		
221	CVS Caremark Amendment to Provider Manual - Nov-July 2014		
222	CVS Caremark Provider Manual - 2016		
223	Prime Therapeutics - Pharmacy Provider Manual - Q1 2015		
224	Prime Therapeutics - Pharmacy Provider Manual - Q3 2015		
225	Prime Therapeutics Provider Manual - 2015		
226	Optum Records		
227	BCBS Small Group Business Proposal for Ability Pharmacy		
228	DOL Remittance Voucher No. 364963		
229	DOL Remittance Voucher No. 382843		
230	DOL Remittance Voucher No. 428442		
231	DOL Remittance Voucher No. 445537		
232	DOL Remittance Voucher No. 676500		
233	DOL Remittance Voucher No. 694582		
234	DOL Remittance Voucher No. 712383		
235	DOL Remittance Voucher No. 730903		
236	DOL Remittance Voucher No. 748947		
237	DOL Remittance Voucher No. 189962		
238	DOL Remittance Voucher No.		

GX	DESCRIPTION	OBJECTION	NOTES
	186260		
239	DOL Remittance Vouchers (Combined)		
300s - Prescriptions			
301	Dr. Michael Taba Prescriptions PART 1 of 3	Hearsay (Rule 802) Authenticity (Rule 901)	
302	Dr. Michael Taba Prescriptions PART 2 of 3	Hearsay (Rule 802) Authenticity (Rule 901)	
303	Dr. Michael Taba Prescriptions PART 3 of 3	Hearsay (Rule 802) Authenticity (Rule 901)	
304	Dr. Kevin Williams Prescriptions	Hearsay (Rule 802) Authenticity (Rule 901)	
305	Dr. Leslie Benson Prescriptions	Hearsay (Rule 802) Authenticity (Rule 901)	
306	Nicolas Aguilar Prescriptions	Hearsay (Rule 802) Authenticity (Rule 901)	
307	Dr. Michael Taba Prescriptions - Physical Exhibit	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901)	
308	Dr. Kevin Williams Prescriptions - Physical Exhibit	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901)	
309	Dr. Leslie Benson Prescriptions - Physical Exhibit	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901)	

GX	DESCRIPTION	OBJECTION	NOTES
310	Nicolas Aguilar Prescriptions - Physical Exhibit	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901)	
400s – Substantive Count Evidence			
401	Prescriptions for M.M.	Hearsay (Rule 802) Authenticity (Rule 901)	
402	Blue Cross Blue Shield Billing Data Excerpt for M.M.	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)	
403	Blue Cross Blue Shield Billing Data Excerpt for M.M.	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)	
404	Prescriptions for A.G.	Hearsay (Rule 802) Authenticity (Rule 901)	
405	Blue Cross Blue Shield Billing Data Excerpt for A.G.	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901) Improper use of summary chart; underlying records not voluminous; argumentative	

GX	DESCRIPTION	OBJECTION	NOTES
		(Rule 1006)	
406	Blue Cross Blue Shield Billing Data Excerpt for A.G.	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)	
407	Prescriptions for R.M.	Hearsay (Rule 802) Authenticity (Rule 901)	
408	Blue Cross Blue Shield Billing Data Excerpt for R.M	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)	
409	Blue Cross Blue Shield Billing Data Excerpt for R.M	Prejudice, Misleading (Rule 403) Hearsay (Rule 802) Authenticity (Rule 901) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)	
410	Prescriptions for M.C.		
411	Benson Patient file for M.C.		
412	Department of Labor Claims Data Excerpt for M.C.		
413	Department of Labor Claims Data Excerpt for M.C.		
414	Prescriptions for L.S.		
415	Benson Patient File for L.S.		

GX	DESCRIPTION	OBJECTION	NOTES
	(Lumbar)		
416	Benson Patient File for L.S. (Knee)		
417	Department of Labor Claims Data Excerpt for L.S.		
418	Department of Labor Claims Data Excerpt for L.S.		
419	Prescriptions for R.C.		
420	Taba Patient File for R.C.		
421	Department of Labor Claims Data Excerpt for R.C.		
422	Department of Labor Claims Data Excerpt for R.C.		
423	Prescriptions for L.B.		
424	Taba Patient File for L.B.		
425	Department of Labor Claims Data Excerpt for L.B.		
426	Department of Labor Claims Data Excerpt for L.B.		
427	Prescriptions for J.A.		
428	Taba Patient File for J.A.		
429	Department of Labor Claims Excerpt for J.A.		
430	Department of Labor Claims Excerpt for J.A.		
500s – Bank Records			
501	Wells Fargo Account Ending in 6919 held in the name of Sherri Mofid		
502	Signature Card for Wells Fargo Account Ending in 6919		
503	September 8, 2014 Check from Sherri Mofid to Michael Taba for \$10,000		
504	August 14, 2014 Cashier's Check from Sherri Mofid to Michael Taba for \$100,000		
505	September 8, 2014 Cashier's Check Sherrif Mofid to Michael Taba for \$90,000		
506	Scottrade Acct 1792 - Sherri Mofid		
507	TD Ameritrade Acct 3760 - Sherri Mofid		
508	Wells Fargo Acct 3649 - Sherri Mofid		

GX	DESCRIPTION	OBJECTION	NOTES
509	JPMC account ending in 0481 held in the name of Sherri Mofid		
510	Scottrade Investment Account Ending in 1793 Held in the Name of Sherri Mofid		
511	Signature Card for Scottrade Account Ending in 1793		
512	January 1-31, 2016 Statement for Scottrade Account Ending in 1793		
513	Chase Account Ending in 5614 held in the name of Michael Taba		
514	Deposit Slip for \$100,000 to Chase Account Ending in 5614		
515	Deposit Slip for \$90,000 to Chase Account Ending in 5614		
516	Deposit Slip for \$10,000 to Chase Account Ending in 5614		
517	Deposit Slip for \$150,000 to Chase Account Ending in 5614		
518	Deposit Slip for \$70,000 to Chase Account Ending in 5614		
519	Deposit Slip for \$136,600 to Chase Account Ending in 5614		
520	Deposit Slip for \$258,000 to Chase Account Ending in 5614		
521	Withdrawal Slip for \$750,000 from Chase Account Ending in 5614		
522	November 11, 2015 Check from Michael Taba to Sherri Mofid for \$50,000 ending in 5614		
523	Chase Account Ending in 2338 held in the name of Michael Taba		
524	Signature Card for Chase Account Ending in 2338		
525	JPMChase Acct 4105 - Michael Taba		
526	JPMChase Acct 9472 - Michael Taba		
527	Wells Fargo Account Ending in 9217 held in the Name of Christopher J. Rydberg		
528	Signature Card for Wells Fargo Account Ending in 9217		
529	October 15, 2014 Cashier's Check from Christopher J. Rydberg to Michael Taba for \$150,000		

GX	DESCRIPTION	OBJECTION	NOTES
530	July 8, 2015 Cashier's Check from Christopher J. Rydberg to Magnum Surgical Products (Kevin Williams) for \$279,000		
531	Wells Fargo Account Ending in 7909 Held in the Name of Restaurant & Associates, Inc.		
532	Signature Card for Wells Fargo Account Ending in 7909		
533	November 17, 2014 Cashier's Check from Christopher Rydberg to Michael Taba for \$70,000		
534	Wells Fargo Account Ending in 8897 Held in the Name of Bandoola Pharmaceutical, LLC		
535	Signature Card for Wells Fargo Account Ending in 8897		
536	Withdrawal Slip for \$136,630 from Wells Fargo Account Ending in 8897		
537	February 16, 2016 Check from Bandoola Pharmaceutical to Magnum Surgical Products (Kevin Williams) for \$125,000		
538	Withdrawal Slip for \$381,000 from Wells Fargo Account Ending in 8897		
539	Withdrawal Slip for \$560,000 from Wells Fargo Account Ending in 8897		
540	September 21, 2015 Check from Bandoola Pharmaceutical to Magnum Surgical Products (Kevin Williams) for \$219,000		
541	Withdrawal Slip for \$309,010 from Wells Fargo Account Ending in 8897		
542	April 22, 2015 Check to Nicolas Aguilar for \$10,000		
543	December 2, 2015 Check to Nicolas Aguilar for \$10,000		
544	Chase Account Ending in 6653 Held in the Name of Dr. Leyla Nourian		
545	Signature Card for Chase Account Ending in 6653		

GX	DESCRIPTION	OBJECTION	NOTES
546	Withdrawal Slip for \$108,000 from Chase Account Ending in 6653		
547	Ennis State Bank Account Ending in 7903 Held in the Name of Kevin Williams		
548	Signature Card for Ennis State Bank Account Ending in 7903		
549	Deposit Slip for \$214,000 to Ennis State Bank Account Ending in 7903		
550	Deposit Slip for \$219,000 to Ennis State Bank Account Ending in 7903		
551	Deposit Slip for \$309,000 to Ennis State Bank Account Ending in 7903		
552	Wells Fargo Account Ending in 3119 Held in the Name of HJLM, LLC		
553	February 2, 2016 Check from HJLM Holding LLC to Lee Diehl for \$2,000		
554	December 29, 2015 Check from HJLM Holding LLC to David McDonald for Draw on Taba Job for \$3,000		
555	January 26, 2016 Check from HJLM Holding LLC to David McDonald for Taba Job for \$5,300		
556	December 17, 2015 Check from HJLM Holding LLC Jimmy Eaves for Draw on Taba Job for \$5,000		
557	Wells Fargo Account Ending in 0302 Held in the Name Industrial & Family Pharmacy (UNREDACTED)	Prejudice, Misleading (Rule 403)	
558	Signature Card for Wells Fargo Account Ending in 0302		
559	December 1-December 15, 2015 Statement for Account Ending in 0302		
560	January 1-January 31, 2016 Statement for Account Ending in 0302		
561	JP Morgan Chase Account Ending in 9863 Held in the Name of Industrial & Family Pharmacy		
562	Signature Card for JP Morgan Chase Account Ending in 9863		

GX	DESCRIPTION	OBJECTION	NOTES
563	January 19-29, 2016 Statement for JP Morgan Chase Account Ending in 9863		
564	JP Morgan Chase Account Ending in 3462 Held in the Name of Jade & Joy, LLC		
565	Signature Card for JP Morgan Chase Account Ending in 3462		
566	January 1-29, 2016 Statement for JP Morgan Chase Account Ending in 3462		
567	May 1-29, 2015 Statement for JP Morgan Chase Account Ending in 3462		
568	September 1-30, 2015 Statement for JP Morgan Chase Account Ending in 3462		
569	October 30-November 30, 2015 Statement for JP Morgan Chase Account Ending in 3462		
570	May 30-June 30, 2015 Statement for JP Morgan Chase Account Ending in 3462		
571	July 1-31, 2015 Statement for JP Morgan Chase Account Ending in 3462		
572	Prosperity Bank Account Ending in 9542 Held in the Name of Ability Pharmacy, Inc.		
573	Signature Card for Prosperity Bank Account Ending in 9542		
574	Excerpt from January 31, 2016 Statement for Prosperity Bank Account Ending in 9542		
575	Excerpt from October 31, 2015 Statement for Prosperity Bank Account Ending in 9542		
576	Excerpt from November 30, 2015 Statement for Prosperity Bank Account Ending in 9542		
577	JP Morgan Chase Bank Account Ending in 2280 Held in the Name of Ability Pharmacy, Inc.		
578	JP Morgan Chase Signature Card for Account Ending in 2280		

GX	DESCRIPTION	OBJECTION	NOTES
579	January 1-January 29, 2016 Statement for JP Morgan Chase Account Ending in 2280		
580	May 1-May 29, 2015 Statement for JP Morgan Chase Account Ending in 2280		
581	October 1-30, 2015 Statement for JP Morgan Chase Account Ending in 2280		
582	October 31-November 30, 2015 Statement for JP Morgan Chase Account Ending in 2280		
583	September 1-30, 2015 Statement for JP Morgan Chase Account Ending in 2280		
584	Prosperity Bank Account Ending in 6341 Held in the Name of Ability Pharmacy, Inc.		
585	Signature Card for Prosperity Bank Account Ending in 6341		
586	Excerpt from April 30, 2015 Statement for Prosperity Bank Account Ending in 6341		
587	Excerpt from May 31, 2015 Statement for Prosperity Bank Account Ending in 6341		
588	Bank of America Account Ending in 5271 Held in the Name of Ability Pharmacy, Inc.		
589	Signature Card for Bank of America Account Ending in 5271		
590	October 1-31, 2015 Statement for Bank of America Account Ending in 5271		
591	Transaction Logs for 8 Cashier's Checks from Bank of America Account Ending in 5271		
592	JPMChase Acct 3691 - Ability Pharmacy (D Nourian and C Rydberg)		
593	Wells Fargo Bank Account Ending in 6032 Held in the Name of Dehshid Nourian		
594	Signature Card for Wells Fargo Account Ending in 6032		

GX	DESCRIPTION	OBJECTION	NOTES
595	January 1-31, 2016 Statement for Wells Fargo Account Ending in 6032		
596	TD Ameritrade Account Ending in 8494 Held in the Name of Dehshid Nourian		
597	Signature Card for TD Ameritrade Account Ending in 8494		
598	January 2016 Statement for TD Ameritrade Account Ending in 8494		
599	Scottrade Acct 7680 - Dehshid Nourian		
600	BancorpSouth Bank Account Ending in 5371 Held in the Name of Bandoola Pharmacy		
601	Signature Card for BancorpSouth Bank Ending in 5371		
602	July 21, 2015 Statement for BancorpSouth Bank Account Ending in 5371		
603	September 30, 2015 Statement for BancorpSouth Bank Account Ending in 5371		
604	November 30, 2015 Statement for BancorpSouth Bank Account Ending in 5371		
605	JP Morgan Chase Account Ending in 7273 Held in the Name of Jade and Joy, LLC		
606	Signature Card for JP Morgan Chase Account Ending in 7273		
607	June 12-30, 2015 Statement for JP Morgan Chase Account Ending in 7273		
608	July 1-31, 2015 Statement for JP Morgan Chase Account Ending in 7273		
609	BBVA Compass Acct 4076 - Park Row Pharmacy (C. Rydberg)		
610	Wells Fargo Acct 2629 - Park Row (C. Rydberg and A. Khavarmanesh)		
611	JPMChase Acct 1940 - Nourian Dental (L Nourian)		
612	Churchill Mgmt - Records (S Mofid and D Nourian)		

GX	DESCRIPTION	OBJECTION	NOTES
613	Churchill Mgmt CRM Notes		
614	JPMChase Acct 4105 - Michael Taba Refresh		
615	Wells Fargo Acct 2629 - Christopher Rydberg Refresh		
600s – Tax Records			
626	Ability Pharmacy 2015 Form 1120S		
627	Ability 2015 Transcript of Account		
628	Ability 2016 Form 1120S		
629	Second Ability Pharmacy 2016 Form 1120S		
630	Ability 2016 Transcript of Account		
631	2015 General Ledger for Ability Pharmacy		
632	Industrial & Family Pharmacy 2015 Form 1120S		
633	Industrial & Family Pharmacy 2015 Transcript of Account		
634	Industrial & Family Pharmacy Form 1120S 2016 Lack of Records		
635	Industrial & Family Pharmacy 2016 Transcript of Account		
636	2015 Industrial & Pharmacy - Signature Form - Form 8879-S		
637	2016 Industrial & Family Pharmacy - Signature Form - Form 8879-S		
638	2015 General Ledger for Industrial & Family Pharmacy		
639	2016 General Ledger for Industrial & Family Pharmacy		
640	Park Row 2015 Form 1120S		
641	Park Row 2015 Transcript of Account		
642	Park Row 2016 Form 1120S		

GX	DESCRIPTION	OBJECTION	NOTES
643	Park Row 2016 Transcript of Account		
644	Park Row 2015 BBVA Compass & Wells Fargo Bank Records		
645	2015 Park Row Pharmacy - Signature Form - Form 8879-S		
646	2016 Park Row Pharmacy - Signature Form - Form 8879-S		
647	2015 General Ledger for Park Row Pharmacy		
648	2016 General Ledger for Park Row Pharmacy		
649	Dehshid Nourian 2015 Form 1040		
650	Dehshid Nourian Form 1040 2015 (with signatures)		
651	Dehshid Nourian 2015 Transcript of Account		
652	Dehshid Nourian 2016 Form 1040		
653	Dehshid Nourian Form 1040 2016 (with signatures)		
654	Dehshid Nourian 2016 Transcript of Account		
655	Dehshid & A Pirnajmeddin Nourian 2015 Form 4549		
656	2015 Dehshid Nourian - Signature Page - Form 8879		
657	2016 Dehshid Nourian - Signature Page - Form 8879		
658	Ali Khavaramanesh 2015 Form 1040		
659	Ali Khavaramanesh 2015 Transcript of Account		
660	Ali & Mastaneh Sarra Khavaramanesh 2015 Form 4549		
661	Robert Ritter 2015 Form 1040		
662	Robert Ritter 2015 Transcript of Account		
663	Robert Ritter 2015 Form 4549		
664	Julie Ritter 2015 From 1040		

GX	DESCRIPTION	OBJECTION	NOTES
665	Julie Ritter 2015 Transcript of Account		
666	Julie Ritter 2015 Form 4549		
667	Bandoola 2015 Form 1065		
668	Bandoola 2015 Transcript of Account		
669	Bandoola 2016 Form 1065		
670	Bandoola 2016 Transcript of Account		
671	HJLM 2015 Form 1065		
672	HJLM 2015 Transcript of Account		
673	HJLM 2016 Form 1065		
674	HJLM 2016 Transcript of Account		
675	Jade and Joy 2015 Form 1065		
676	Jade and Joy 2015 Transcript of Account		
677	Jade and Joy 2016 Form 1065		
678	Jade and Joy 2016 Transcript of Account		
679	Christopher Rydberg 2015 Form 1040		
680	Christopher Rydberg 2015 Transcript of Account		
681	Jamshid Noryian Form 1040 2015 Certification Lack of Records		
682	Jamshid Noryian 2015 Transcript of Account		
683	Chase 2015_Expenses		
700s – Emails and Text Messages			
701	Email Regarding Shuttle to Cowboys Game		
702	Email Regarding New Clinic for Dr. Benson		
703	Email to Mike Benson Regarding Documents from Jamshid Noryian		
704	Email from Amoret Guadian to Melissa Driver Regarding		

GX	DESCRIPTION	OBJECTION	NOTES
	Patient Complaint		
705	Email from Melissa Driver Regarding No More Refills on Patient T.P.		
706	Email from Amoret Guadian to Melissa Driver Regarding Patient Complaint		
707	Email from Melissa Driver Regarding Denied Patients		
708	Email from Amoret Guadian to Melissa Driver Regarding Updated List of Patient We Can't Fill		
709	Email from Mike Benson to Kimberly McCoy Regarding Script Pad		
710	Email from Christopher Rydberg Regarding Magnum Surgical Products		
711	Email from Melissa Driver to Amoret Guadian Regarding Decrease in Medications		
712	Email from Amoret Guadian to Melissa Driver Regarding Helping at Dr. Taba Practice		
713	Email from Amoret Guadian to Melissa Driver Regarding 3 DOL Patients		
714	Email from Amoret Guadian to Melissa Driver Regarding Dr. Taba Patients on Multivitamin		
715	Email from Melissa Driver to Amoret Guadian Regarding Refill Scripts		
716	Email from Megan Marines to Melissa Driver Regarding Dr. Taba Surgery Patients		
717	Email from Amoret Guadian to Melissa Driver Regarding Patient R.S.		
718	Email from Melissa Driver to Amoret Guadian Regarding Patient J.T.		
719	Email from Melissa Driver to Amoret Guadian Regarding Patients – No Supplements		
720	2016.05.20 Re_ CONFIDENTIAL_ Attorney-Client Privileged Communication		

GX	DESCRIPTION	OBJECTION	NOTES
721	Email from McCoy re Walkthrough of 217 Bella Riva and Humps full name Van Gieson- 401 Time Capsule		
722	April 2016 Text Messages between Kimberly McCoy to Jamshid Noryian		
723	May 2016 Text Messages between Kimberly McCoy and Jamshid Noryian		
724	September 2015 Text Messages Between Kimberly McCoy and Megan Marines		
725	January 2016 Text Messages between Kimberly McCoy and Hump Van Gieson		
726	March 2016 Text Messages between Kevin Williams and Christopher Rydberg		
727	Email from Megan Marines to Judy Bachman Re Rejected Req PA		
800s – Search Warrant Evidence			
801	Blank Prescriptions for Kevin Williams (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
802	Kevin Williams Promissory Notes		
803	Michael Taba Promissory Note		
804	Handwritten Notes Regarding Leslie Benson and Michael Taba Scar Gel	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
805	Handwritten Notes Regarding Michael Taba and Jamshid Noryian Phone Numbers (Site 1)	Relevance (Rule 402) Prejudice, Misleading	

GX	DESCRIPTION	OBJECTION	NOTES
		(Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
806	Notes Regarding Expenses and Income (Site 4)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
807	Article Regarding North Texas Compounding Investigation (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403)	
808	Benson Patient Sent in on December 23, 2014 (Site 2)		
809	Email Regarding Benson Referrals April 1 - October 16 (Site 4)		
810	Notes Regarding Patients James Brought In (Site 2)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
811	Ability Blank Prescriptions (Site 4)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
812	Blank Prescriptions (Site 3)	Relevance (Rule 402) Prejudice, Misleading (Rule 403)	

GX	DESCRIPTION	OBJECTION	NOTES
		Authenticity (Rule 901) Hearsay (Rule 802)	
813	List of Benson Temple Patients (Site 2)		
814	Taba Surgery Schedule Referrals December 3, 2014 (Site 2)		
815	Report of Taba Claims (Site 1)		
816	Ability All Drugs Log (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403)	
817	Ability All Pay Plans (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403)	
818	Taba 6 5 Labels (Site 1)		
819	Handwritten Notes (Site 1)		
820	Report of Benson Claims (Site 5)		
821	Handwritten Notes (Site 5)		
822	Handwritten Notes Regarding Contacting Patients (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403)	
823	Medicare Fraud Training (Site 1)		
824	Handwritten Notes (Site 5)		
825	Selective Rx Journal Reports (Site 5)		
826	Patient Summary for K.H. (Site 5)		
827	Handwritten Note (Site 5)		
828	Report of Kevin Williams Claims March 2015 (Site 2)		
829	Report of Michael Taba Claims February 2015 (Site 2)		
830	Judy Bachman Bandoola Bonus Letter (Site 4)		
831	Records Regarding HJLM Holding, LLC v. Magnum Surgical Products, LLC		
832	Original Petition		
833	Original Answer		
834	Certified Judgement		
835	Ability Blank Prescription Forms	Relevance (Rule 402)	

GX	DESCRIPTION	OBJECTION	NOTES
	(Site 2)	Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
836	Blank Prescription Form (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
837	Report of Michael Taba Claims May-June 2014 (Site 2)		
838	Kevin Williams Commission Report February 2015 (Site 2)		
839	Notes on Insurance (Site 5)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
840	Notes on Compound Medication Ingredients (Site 1)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
841	Notes on Calling on Refills (Site 1)	Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
842	Letter of Intent to Michael Taba Re Lease of 411 N General Bruce		
843	Script for Insurance Information (Site 5)	Relevance (Rule 402) Prejudice, Misleading (Rule	

GX	DESCRIPTION	OBJECTION	NOTES
		403) Authenticity (Rule 901) Hearsay (Rule 802)	
844	Michael Taba Department of Labor Patient List (Site 4)		
845	Handwritten Notes Regarding Purpose of Each Pharmacy (Site 4)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Hearsay (Rule 802)	
846	Handwritten Notes Regarding Patients of Michael Taba and Leslie Benson (Site 5)		
847	Notes Regarding Holding Companies and Properties (Site 5)		
848	Revenue by Doctor (Site 5)		
849	Ledger (Site 5)		
850	Rxpress Financial Notes (Site 5)		
851	Check Register (Site 5)		
852	Rxpress Balance Sheet (Site 5)		
853	Fax from Leslie Benson's Office Regarding Cream Scripts (Site 2)		
854	Handwritten Notes Regarding Jamshid Noryian by L.M.		
855	Letter to James Noryian from M.M. (Site 4)		
856	Letter to James Noryian from A.G. (Site 4)		
857	Letter to James Noryian from R.M. (Site 4)		
858	Fax from Dr. Taba's Office Regarding Patient Schedules (Site 5)		
859	Fax from Dr. Taba's Office Regarding Patient Schedules (Site 2)		
860	Prescription by Dr. M.H. Deshid Nourian (Site 4)	Relevance (Rule 402) Unfair Prejudice, Misleading (Rule 403) Authenticity (Rule 901)	

GX	DESCRIPTION	OBJECTION	NOTES
		Hearsay (Rule 802)	
861	Envelope Addressed to Sherri Mofid (Site 2)		
862	List of Expenses (Site 5)		
863	Revenue by Doctor (Site 5)		
864	Checks to Suppliers (Site 2)		
865	Handwritten Note Re J. Noryian		
866	Aguilar Report	Relevance (402) Unfair prejudice, confusing, misleading (403)	
867	Prescription - Weaver, Ruby		
868	Prescription - Welch, Debra		
869	Photo: February 2016 Newspaper Article titled "Feds investigate Fort Worth-based firm"	Relevance (Rule 402) Prejudice, Misleading, Confusion of Issues (Rule 403) Authenticity (Rule 901)	
870	Photo: Report of Michael Taba Claims Dated November 2014		
871	TMESYS Accepted Claims - Industrial and Family Pharmacy	Relevance (Rule 402) Prejudice, Misleading, Confusion of Issues (Rule 403)	
900s – Miscellaneous Documents			
901	Photo: Ability Pharmacy (Exterior)		
902	Photo: Ability Pharmacy (Interior)		
903	Photo: Industrial Pharmacy (Exterior)		
904	Photo: Industrial Pharmacy (Interior)		
905	Photo: Park Row Pharmacy (Exterior)		
906	Photos: Park Row Pharmacy (Interior)		
907	Photo: Ability Pharmacy Rx Ending 057-00 (Blue Bottle) for L.S.		

GX	DESCRIPTION	OBJECTION	NOTES
908	Photo: Ability Pharmacy Rx Ending 436-00 (White Cap/Tan Bottle) for L.S.		
909	Photo: Ability Pharmacy (Bottles on Microwave) for L.S.		
910	Photo: Ability Pharmacy and Industrial & Family (Blue and Clear/White Bottles) for R.C.		
911	Photo: Louis Vuitton Handbag		
912	Photos: BMW		
913	Photo: 217 Bella Riva		
914	Recorded Conversation - James Noryian and Jared Haggard 10.05.15		
915	Transcript of Recorded Call - J. Noryian and J. Haggard 10.05.15		
916	Recorded Conversation - James Noryian and Jared Haggard 10.05.15 (Closed-Captioned)		
917	Recorded Conversation - Dehshid Nourian and Jeff Byrum 01.26.16	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901)	
918	Transcript of Recorded Call - D. Nourian and J. Byrum 01.26.16	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901) Best evidence rule; requirement of the original (Rule 1002)	
919	Recorded Conversation: Dehshid Nourian and Jeff Byrum 01.26.16 (Closed-Captioned)	Relevance (Rule 402) Prejudice, Misleading (Rule 403) Authenticity (Rule 901)	

GX	DESCRIPTION	OBJECTION	NOTES
		Best evidence rule; requirement of the original (Rule 1002)	
920	Recorded Conversation - James Noryian and Rey Moreno 06.28.16		
921	Transcript of Recorded Call - J. Noryian and R. Moreno 06.28.16		
922	Recorded Conversation - James Noryian and Rey Moreno 06.25.16 (Closed-Captioned)		
923	Mailbox Service Agreement Signed by Leyla Nourian		
924	Photo: 217 Bella Riva		
925	Photo: 217 Bella Riva		
926	Photo: 217 Bella Riva		
927	Stewart Title - 217 Bella Riva		
928	Alamo Title - 2525 Handley - Leyla Nourian		
929	Van Alstyne - Sherri Mofid		
930	Autobahn BMW		
930	Prescription Pain Cream Medication Tubes – Physical Exhibit		
931	Prescription Vitamins Bottles – Physical Exhibit		
932	Louis Vuitton Handbag – Physical Exhibit		
1000s – Summary Charts			
1001	Total Amounts Billed to DOL-OWCP	Relevance (Rule 402) Unfair prejudice, confusing, misleading (Rule 403)	
1002	Total Amounts Paid by DOL-OWCP	Relevance (Rule 402) Unfair prejudice, confusing, misleading (Rule 403)	
1003	Ability and Park Row Pharmacies BCBS Claims Data - All Claims	Relevance (Rule 402) Unfair prejudice, confusing, misleading (Rule 403)	
1004	Ability Pharmacy BCBS Claims Data - All Claims	Relevance (Rule 402)	

GX	DESCRIPTION	OBJECTION	NOTES
		Unfair prejudice, confusing, misleading (Rule 403)	
1005	Ability Pharmacy BCBS Claims Data - Employee		
1006	Ability Pharmacy - Megan Marines - Rx No. 948636		
1007	Ability Pharmacy - Amoret Guadian - Rx No. 948634		
1008	Ability Pharmacy - Reynaldo Moreno - Rx No. 948617		
1009	Deposits of DOL Funds	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous</p> <p>Argumentative (Rule 1006)</p> <p>Best evidence rule requirement of the original (Rule 1002)</p>	
1010	Count 11 Wire Transfer	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1011	Count 11 Cashier's Checks	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1012	Count 12 Online Transfer	Cumulative (Rule 403)	

GX	DESCRIPTION	OBJECTION	NOTES
		<p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1013	Count 13 Wire Transfer	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1014	Counts 11–13 Transfer	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1015	Count 14 Wire Transfer	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1016	Count 14 Cashier's Checks	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative</p>	

GX	DESCRIPTION	OBJECTION	NOTES
		(Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1017	Count 15 Online Transfer	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1018	Count 16 Wire Transfer	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1019	Cashier's Checks	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1020	Counts 14–16 Transfer	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule;	

GX	DESCRIPTION	OBJECTION	NOTES
		requirement of the original (Rule 1002)	
1021	Direct Payments to Michael Taba w/o Repayments	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1022	Direct Payments to Michael Taba w/ Repayments	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1023	Other Payments to Michael Taba	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	
1024	Taba Account Balances	Cumulative (Rule 403) Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006) Best evidence rule; requirement of the original (Rule 1002)	

GX	DESCRIPTION	OBJECTION	NOTES
1025	Assets Traced from DOL Funds	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1026	Payments to Kevin Williams	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1027	Reported vs Actual Expenses	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1028	Cashier's Check 7 Example	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1029	Cashier's Check 76 Example	<p>Cumulative (Rule 403)</p> <p>Improper use of summary</p>	

GX	DESCRIPTION	OBJECTION	NOTES
		<p>chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1030	Cashier's Check 137 138 Example	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1031	Cashier's Check 183 184 185 Example	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1032	Cashier's Check 205 Example	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p> <p>Best evidence rule; requirement of the original (Rule 1002)</p>	
1033	Cashier's Checks Purchased and Expensed	<p>Cumulative (Rule 403)</p> <p>Improper use of summary chart; underlying records not voluminous; argumentative (Rule 1006)</p>	

GX	DESCRIPTION	OBJECTION	NOTES
		Best evidence rule; requirement of the original (Rule 1002)	

Dated: August 21, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on August 21, 2023, I served upon all counsel of record a true and correct copy of this motion by filing it with the Court's CM/ECF system.

/s/ Scott C. Thomas
Scott C. Thomas